

FEB 01 2000

MR. GORDON APPEL: Thank you for the opportunity to offer these comments at this meeting.

- 1... My name is Gordon Appel, A-p-p-e-l, and I am the Deputy Director of the Illinois Department of Nuclear Safety.

Since 1983 when the department started its spent nuclear fuel inspection and escort service, we have escorted over 450 shipments of nuclear and spent fuel across Illinois by both road and rail. We are confident that this can be done safely. It is done safely on a regular basis today, and will continue to be done safely partly because of our efforts and involvement.

We look forward to consultation in detail with DOE relative to the transportation routes and modes within and through the State of Illinois. We do have some concerns, however, about some of the assumptions made relative to transportation in the EIS document.

We note that some maps recently appeared, apparently, on your Web site. We will take the opportunity to review those and we will include any comments we have, may have relative to those maps with our formal commentary which we will send to you in writing before the end of the comment period.

- 5 Obviously, if a spent nuclear fuel repository at Yucca Mountain is opened some time in the future, the number of shipments of spent fuel traversing Illinois will logically increase. But it seems to us that the frequency of shipments through Illinois appears to be skewed, and we wonder whether or not that skewing is not intentional. By skewing, we mean that they appear to be greater than they should be.

- 6 Based on both Nevada's and DOE's evaluations of the routing and transportation issues, one could develop the impression that there are no transportation routes that traverse the southern tier of the United States. All shipments from the eastern part of the United States go through the State of Illinois, either through St. Louis or through the Chicago area highways and railways.

We wonder whether or not this is the result of some effort to avoid shipments across Hoover Dam in Nevada, although we wonder why shipments across Hoover Dam would be different than shipments across any other bridge in the United States.

- 2 We would like DOE to take control of issues that it can relative to the specific mode of transport, and to make sure that the infrastructure upgrades that are necessary for safe transportation of spent nuclear fuel and high-level waste are performed regardless of the district that the waste is shipped through.

And DOE has obviously made some very specific assumptions about the routes from each of the reactor sites to Yucca Mountain, because they are able to calculate distances to four significant digits. I presume that our request to see the specific routing is the reason why those maps appeared on the Web site recently.

- 3... The Department of Nuclear Safety remains committed to working cooperatively with DOE on national and Illinois specific issues related to transportation through Illinois, and working with

3 cont them on the regional transportation work groups as we have in the past. In particular, we would like to note, that we will want to discuss with you specific ways to avoid whenever necessary and whenever possible, highly congested traffic corridors such as the I-80, 294 and 94 corridor here in Chicago.

We simply do not believe that spent fuel shipments through the Chicago area on the highways should be sent down the Borman Expressway at times of high traffic congestion, and we will be discussing ways with you that we think that high traffic in these areas can be avoided.

DR. LAWSON (Facilitator): 30 seconds, please.

4 MR. APPEL: We have all heard and will continue to hear the rhetoric that is aimed at promoting general hysteria in the public about safe transportation of radioactive materials. We would like to point out that safe transportation of these materials can be accomplished, and is accomplished all the time. It is obvious that at some point we, as a nation, will need to effectively and safely move high-level waste and spent nuclear fuel to a safe disposal site location. And the Department of Nuclear Safety is ready to perform its responsibilities to see that this can happen in Illinois as it has done over the past 17 years, in spite of the lack of credibility some would place in this state's radiation protection agency that works for them every day.

Thank you.